

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases Noted on Attached Appendix

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND [PROPOSED] ORDER
DISMISSING WITH PREJUDICE CLAIMS
PURSUANT TO ALLERGAN PUBLIC GLOBAL SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, the “Dismissing Plaintiffs”) and the Allergan Defendants¹ that, pursuant to the election of each Dismissing Plaintiff to participate in the Allergan Public Global Settlement Agreement (the “Allergan Settlement Agreement”), which is dated July 24, 2023, is binding on the Dismissing Plaintiffs and the Allergan Defendants, and has an Effective Date of August 7, 2023 (a copy of which is attached as Appendix B), all claims of each Dismissing Plaintiff against any Allergan Defendants are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs. The Court shall retain jurisdiction with respect to the Allergan Settlement Agreement to the extent provided under that Agreement.²

¹ The Allergan Defendants are each and every “Released Entity” as set forth in Section I of the Allergan Settlement Agreement, dated as of July 24, 2023, a copy of which is attached as Appendix B.

² To the extent any Plaintiff Subdivision is inadvertently included on Appendix A, the Court retains jurisdiction to hear those disputes. In advance of raising any such issue with the Court, the Plaintiff Subdivision must meet and confer with defense counsel and Plaintiffs’ Liaison Counsel.

Dated: July 25, 2023

Respectfully submitted,

Agreed as to form and substance:

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Counsel for the Allergan Defendants

SO ORDERED this __ day of _____, 2023.

Hon. Dan Aaron Polster
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

/s/Peter H. Weinberger

Peter H. Weinberger